

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**NICOLE P. ERAMO**

**Plaintiff**

**V.**

**ROLLING STONE LLC,  
SABRINA RUBIN ERDERLY, and  
WENNER MEDIA LLC,**

**Defendants.**

[illegible]

Case No. 3:15-cv-00023-GEC

## **PLAINTIFF'S MOTION TO REMAND**

Plaintiff Nicole P. Eramo, through her undersigned counsel, hereby moves this Court, pursuant to 28 U.S.C. § 1447(c) and 28 U.S.C. § 1446(b), to enter an order remanding this action to the Circuit Court of the City of Charlottesville due to Defendants' failure to properly establish the presence of diversity jurisdiction. Plaintiff's Memorandum of Law in Support of Motion to Remand is being filed contemporaneously herewith in accordance with Local Rule 11(c).

Dated: June 8, 2015

Respectfully submitted,

By: /s/ Elizabeth M. Locke

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*ATTORNEYS FOR PLAINTIFF*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Plaintiff's Motion to Remand in the above-captioned matter was served on the below counsel of record on June 8, 2015, via the Court's electronic filing system.

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*Attorneys for Defendants Rolling Stone LLC,  
Sabrina Rubin Erdely, and Wenner Media LLC*

Dated: June 8, 2015

By: /s/ Elizabeth M. Locke  
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